

John D. Hughes  
 Michael P. Thompson  
 Robert W. DiUbaldo  
 EDWARDS ANGELL PALMER & DODGE, LLP  
 750 Lexington Avenue  
 New York, NY 10022  
 Telephone: (212) 308-4411  
*Counsel to Allied World Assurance Company (U.S.), Inc.*

UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	: Chapter 11
REFCO INC., <u>et al.</u> ,	: Case No. 05-60006 (RDD)
	: (Jointly Administered)
Debtors.	:
-----X	
JOSEPH MURPHY, <u>et al.</u> ,	:
	:
Plaintiffs,	: Adv. Proc. No. 08-01133 (RDD)
v.	:
ALLIED WORLD ASSURANCE	:
COMPANY (U.S.), INC. and ARCH	: Civ. Action No. _____
INSURANCE COMPANY,	:
	:
Defendants, and.	:
	:
JOHN D. AGOGLIA, EDWIN L. COX,	:
SUKHMEET DHILLON, THOMAS H.	:
DITTMER, STEPHEN GRADY,	:
THOMAS HACKL, ERIC G. LIPOFF,	:
PETER MCCARTHY	:
and FRANK MUTTERER,	:
	:
Nominal Defendants	:
-----X	

**NOTICE OF MOTION TO WITHDRAW  
THE REFERENCE TO THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE that, upon the annexed Memorandum, the Declaration of Michael P. Thompson and the exhibits annexed thereto, the pleadings and papers on file, and upon such other matters as may be presented to the Court at the time of hearing, defendant Allied World Assurance Co. (U.S.) Inc. ("Allied World"), by its undersigned attorneys, will move in the United States District Court for the Southern District of New York, at Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, New York, before a judge to be assigned, at a date and time to be determined by this Court, for the entry of an Order, pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011(a), and Local Bankruptcy Rule 5011-01, for cause shown, withdrawing the reference to the United State Bankruptcy Court for the Southern District of New York of the above-captioned adversary proceeding filed by certain former directors and officers of Refco, Inc. and/or its subsidiaries, for the reasons more fully set forth in the Memorandum, together with such other relief as the Court may deem just and proper. The Plaintiffs have assented to this Motion.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Local Civil Rule 6.1(b), answering papers, if any, shall be served upon the undersigned no later than ten business days after service of this Notice of Motion. Allied World's reply shall be served within five days of service of any opposition papers.

Date: April 30, 2008

Respectfully submitted,  
EDWARDS ANGELL PALMER & DODGE LLP

By: /s/ John D. Hughes

John D. Hughes  
Michael P. Thompson  
Robert W. DiUbaldo  
750 Lexington Avenue, 8<sup>th</sup> Floor  
New York, New York 10022  
(212) 308-4411

*Attorneys for Allied World  
Assurance Company (U.S.), Inc.*